STATE OF IOWA

BEFORE THE IOWA UTILITIES BOARD

IN RE: **INTERSTATE POWER AND LIGHT COMPANY**	**DOCKET NO. EEP-2022-0150**

ADDITIONAL INFORMATION

COMES NOW, Interstate Power and Light Company (IPL) and, pursuant to the Iowa Utilities Board (Board) November 14, 2022 Staff Correspondence Requesting Additional Information (November 14 Correspondence), hereby submits its response to the additional information requested.

Request No. 1

Pursuant to 199 IAC 35.5(4)(d)(5), the number of eligible participants.

IPL's Response to Request No. 1:

Table 1 provides an estimate of eligible customers for each program outlined in IPL's 2024-2028 Energy Efficiency Plan (EEP).

Table 1. Eligible Customers

Program	Sector	Fuel Type	Eligible Customers
Comprehensive Income Qualified	Low Income Residential	Electric	101,997
		Gas	49,709
	Moderate to Low Income	Electric	75,264
		Gas	36,680
Demand Response	Large C&I	Electric	1,375
	Residential	Electric	411,277
	Small and Medium Businesses	Electric	84,646
Efficient Products	Nonresidential	Electric	84,646
		Gas	24,147
	Residential	Electric	411,277
		Gas	200,438

Efficient Services	Nonresidential	Electric	84,646
		Gas	24,147
	Residential	Electric	411,277
		Gas	200,438

Data source: Alliant Energy customer counts, United States Census American Community Survey for income qualification adjustment.

Request No. 2

Pursuant to 199 IAC 35.5(4)(e), the estimated net capacity and energy savings.

IPL's Response to Request No. 2:

Table 2 provides an estimate of net energy and capacity savings for each program outlined in IPL's 2024-2028 EEP.

Programs	Cumulative Energy Savings		Demand		NTG Ratio		Net Cumulative Energy Savings		Net Demand	
	Electricity (GWh)	Natural Gas (therms)	Electricity (MW)	Natural Gas (therm-days)	Electric	Gas	Electricity (GWh)	Natural Gas (therms)	Electricity (MW)	Natural Gas (therm-days)
Efficient Products	327	3,174,858	21	8,943	52%	54 %	170	1,698,549	11	4,785
Efficient Services	172	33,832	4	-	80%	80 %	138	27,066	3	-
Comprehensive Income Qualified	2	515,963	0	1,311	100 %	100 %	2	515,963	0	1,311
Energy Awareness and Education										
Demand Response	5	-	266		100 %		5		266	
Total Plan	506	3,724,653	291	10,255			315	2,241,578	280	6,096
Total Forecasted Retail Sales	73,081	1,414,488,627					73,081	1,414,488,627		
% Forecasted Retail Sales	**0.7%**	**0.3%**					**0.4%**	**0.2%**		

Data source: Opinion Dynamics, Iowa Gas and Electricity Potential Study Net-to-Gross Research, April 15, 2017.

Request No. 3

Pursuant to 199 IAC 35.5(4)(g), further describe cost categories by the following subcategories: classifications of persons to be working on energy efficiency and

demand response programs, full-time equivalents, dollar amounts of labor costs, and the name of outside firm(s) employed and a description of service(s) to be provided.

IPL's Response to Request No. 3:

As outlined in IPL's Application Exhibit 1 Energy Efficiency Plan*, Section 3.3.2 Program Cost Components*, "IPL staff contributing to energy efficiency and demand response program delivery fall into the following labor categories: regulatory, corporate communications, account management, product management, information technology, executive review, and general and analytical support. In total, IPL's Plan assumes 14 full time equivalent staff persons will be dedicated to delivering the Plan, at a total labor cost of $9,873,946."

Further, as outlined in *Section 5.1, Outside Services*, "The outside service providers IPL currently uses to deliver its programs are listed in Table 3; these vendors may be subject to change during the Plan as existing contracts expire or new service vendor needs are identified following completion of a competitive bidding process.

Table 3. Outside Service Providers

Component	Pathway	Vendor	Role
Efficient Products			
Prescriptive	Upstream Markdowns	Uplight	Program implementation
	Midstream Instant Discounts	DNV	Program implementation
	Downstream Rebates	Michaels Energy	Rebate processing
Custom	Downstream Custom Rebates	Michaels Energy	Program implementation
	Retrocommissioning	Michaels Energy Power Takeoff	Program delivery
Efficient Services			
Home Energy Reports	N/A	Uplight	Program implementation
Business Energy Solutions	Turnkey projects (all)	CLEAResult	Program implementation
Appliance Recycling	N/A	CLEAResult	Program implementation
New Construction	Streamlined Standard Enhanced	The Weidt Group	Program implementation
	Industrial	Michaels Energy	Program implementation

Comprehensive Income Qualified			
Single Family	Low-Income	Community Action Program agencies	Program implementation
	Limited-Income	TBD	Program implementation
Multifamily and Institutional Low-Income	N/A	The Energy Group	Program implementation
Energy Awareness and Education			
Energy Education	My Home Portal, Energy Edge	Uplight	Program delivery
	LivingWise	N/A	Implemented using IPL internal resources
	Online Assessments	Uplight	Program delivery
Non-Targeted Awareness	PowerHouse TV	Gate House	Program production
	Advertising	N/A	Implemented using IPL internal resources
	Community Tree Planting	Trees Forever	Program implementation
Nonresidential Technical Assistance	Assessments	The Energy Group	Program delivery
	Audits	Michaels Energy	Program delivery
	Feasibility Studies	Customer-selected vendor	Program delivery
	Strategic Energy Management	Michaels Energy	Program delivery
Demand Response			
Behavioral Demand Response	Peak Time Rebates	TBD	New vendor will be selected following Board approval
Nonresidential Interruptible	N/A	N/A	Implemented using IPL internal resources
Direct Load Control	Appliance Cycling	ESCO Electric Trebil Electric Brockway Company American Messaging	Customer switch removal and communication services
	Bring Your Own Device	Uplight	Program implementation

Finally, IPL will work with a range of market partners and dealers involved in energy efficiency to engage customers, promote programs, evaluate projects, furnish and install energy-efficient equipment, and provide ancillary energy efficiency services.

1. Dealers will provide products and services directly to customers in support of IPL's programs but are not under contract to IPL. IPL will use several types of dealers to deliver its programs:
    a. Lighting and other contractors, retailers, distributors/dealers, and installers
    b. Commercial builders

c. Technical engineering and energy services firms

2. Market partners are independent market participants that may provide support or services to IPL customers, typically to achieve mutually beneficial results or to serve mutual target populations. Market partners will not generally be supported by IPL funding and are not under contract to IPL. For example, schools that participate in LivingWise are market partners because they will act as a conduit for reaching the school community, but they will not receive a direct financial benefit from the program. Stakeholders and community-based organizations are additional market partners."

Request No. 4

Pursuant to 199 IAC 35.5(4)(m)(4)(1), graphical representation of the utility's 20-year planning horizon comparing forecasted demand in each year from subparagraph 35.5(4)(m)(1) to committed capacity in each year from numbered paragraphs 35.5(4)(m)(3)(1) to 35.5(4)(m)(3)(4).

IPL's Response to Request No. 4:

IPL provided the load and capability projection in Application Exhibit 12 "Additional Requirements for Electric Utilities (4 of 6)", tab "L&C position". IPL provides a graph of the projected position in confidential spreadsheet attachment "IUB 4 Attachment A – CONFIDENTIAL." Note that for resource planning purposes this 20-year projection includes the addition of generic resources as noted on the "L&C position" tab.

Request No. 5

Pursuant to 199 IAC 35.5(4)(m)(6), future supply options and costs.

a. Staff notes that IPL's "Cross Index to Board Rules" refers to Application Exhibit 12 Additional Requirements for Electric Utilities (5 of 6), but upon review of this exhibit, Staff finds no reference to future supply options and costs.

i. If the requirements of 199 IAC 35.5(4)(m)(6) are addressed elsewhere in IPL's filing, provide a specific reference, including page numbers, in its response.
ii. If IPL does not believe future supply options will be needed, other than the planned additions outlined in "IPL Application Exhibit 12 Additional Requirements for Electric Utilities (3 of 6)," provide a statement to that effect.

IPL's Response to Request No. 5:

The installed costs for IPL's potential future supply options are provided in Application Exhibit 12 "Additional Requirements for Electric Utilities (4 of 6)". See tabs such as "IPL Additions", "Capital Costs", and "Tax Credits". For additional information, IPL is providing Confidential spreadsheet "IUB 5 Attachment A – CONFIDENTIAL", which contains an Operations and Maintenance ("O&M") tab with FOM and VOM assumptions, and a Transmission Interconnection Costs tab for wind, solar, and thermal/storage technology options.

Request No. 6

Pursuant to 199 IAC 35.5(4)(n)(1)(6), an explanation of all significant methods and data used, as well as assumptions made, in the current five-year forecast(s). The utility shall file all forecasts of variables used in its demand and energy forecasts. If variables are not forecasted, the utility shall indicate all sources of variable inputs.

a. "IPL Application Exhibit 13 Additional Requirements for Gas Utilities (1 of 2)," page 18, references Appendix A – IPL Gas Sales Forecast Methodology 2022.doc and Appendix B – IPL Gas Design Day Methodology 2022.doc. These appendices do not appear to have been filed in Docket No. EEP-2022-0150.

IPL's Response to Request No. 6:

The referenced documents are included as attachments to this data request as IUB 6 Attachment A and IUB 6 Attachment B.

Request No. 7

Pursuant to 199 IAC 35.5(4)(n)(2), a graphical representation of the utility's five-year planning horizon comparing forecasted peak day demand in each year from numbered paragraph 35.5(4)(n)(1)(1) to the total of existing contract deliverability, from numbered paragraph 35.5(4)(n)(1)(5).

IPL's Response to Request No. 7:

A graphical representation comparing the forecasted peak to the existing contract deliverability is found in "IUB 7 Attachment A – CONFIDENTIAL."

Request No. 8

Pursuant to 199 IAC 35.5(4)(n)(3), supply options.

a. Staff notes that IPL's "Cross Index to Board Rules" refers to "IPL Application Exhibit 13 Additional Requirements for Gas Utilities (1 of 2), " but upon review of this exhibit, Staff finds no reference to supply options.
    i. If the requirements of 199 IAC 34.5(4)(n)(3) are addressed elsewhere in IPL's filing, provide a specific reference, including page numbers, in its response.
    ii. If IPL does not believe future supply options will be needed, provide a statement to that effect.

IPL's Response to Request No. 8:

IPL does not have a projected capacity shortfall in the 12-month and five-year planning horizons. The Reserve Forecast in Application Exhibit 13 (1 of 2) *Table 13.1.1c* breaks down positive, negative, and flat reserve margins by Pipeline. IPL's total aggregate Reserve Forecast is positive. Annually IPL meets its NGPL shortfall with firm delivered gas supply and excess capacity and flexibility in its NNG-NBPL agreements.

Additional Request:

Staff requested that IPL provide detailed information regarding the process used for determining the Nonresidential Interruptible credit for participating customers. While not required as part of the filing requirements of 199 IAC 35.5(4), this credit was the subject of objections in Docket No. TF-2022-0020, and Staff believes it would be beneficial for IPL to discuss the process it undertook to determine that the credit should remain the same for the 2024-2028 plan cycle and whether IPL anticipates adjusting the credit during the 2024-2028 plan.

IPL's Response:

The process used to determine the Nonresidential Interruptible credit for participating customers was determined by estimating the market capacity value using the weighted average of: 1) a long-term market price reflected in Cost of New Entry (CONE), in this case derived from the MISO 2018-2019 Planning year ($88.87/kW/year) and; 2) a short-term market price, in this case derived from the Wood Mackenzie H1 2017 Outlook of the MISO capacity Planning Reserve Auction (PRA) price for 2018, $25.40/MW-day. IPL weighed the two market capacity values at a ratio of approximately 85/15, giving the most weight to CONE values to reflect the longer-term value of demand response as a capacity resource on IPL's system. The resulting value is $75.34/kW/year.

As noted in Gehrke Direct Testimony at page 8,

> "IPL acknowledges additional modifications may be necessary to the Large Commercial and Industrial Interruptible component of the Demand Response program as the result of ongoing changes to values for capacity additions and the implementation of Midcontinent Independent System Operator's (MISO) seasonal construct. IPL commits to working with Plan intervenors to address these changes during the regulatory process and as needed during Plan implementation."

WHEREFORE, IPL respectfully requests that the Board accept IPL's response to the Board's November 14 Correspondence requiring additional information.

Dated this 2nd day of December 2022.

Respectfully submitted,

INTERSTATE POWER AND LIGHT COMPANY

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